

The Law Offices of Dean L. Woerner
Dean L. Woerner SBN 214372
P. O. Box 411405
San Francisco, CA 94141-1405
415.550.8799 (Telephone)
415.651.8537 (Fax)
woerner@sanfranbk.com

Attorney for Debtors
William David Moran
Graciela Vasquez

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re:

WILLIAM DAVID MORAN and
GRACIELA VASQUEZ,

Debtors.

Case No. **13-30372 HLB**
Chapter 13

Date: **June 19, 2013**
Time: **9:40 AM**
Location: **US Bankruptcy Court**
235 Pine Street, 23rd Floor
San Francisco, CA

OPPOSITION TO MOTION OF CHAPTER 13 TRUSTEE, DAVID BURCHARD, TO
DISMISS CASE PRIOR TO CONFIRMATION

Debtors **WILLIAM DAVID MORAN** and **GRACIELA VASQUEZ**, through their attorney of record, Dean L. Woerner, hereby oppose the Trustee's Motion to Dismiss their case prior to confirmation on the following grounds.

PLAN PAYMENTS

The Debtors' petition was filed on February 20, 2013, and their Chapter 13 Plan was filed March 7, 2013. The Trustee's website reflects three Plan payments received, which is the number due at present. The Debtors are current in their Plan payments.

TRUSTEE'S REQUESTS

1. **Attachment to Schedule J.** Debtors filed an Attachment to Schedule J, listing Business Income and Expenses, on June 5, 2013.
2. **Bank Statements.** In submitting the Chapter 13 Business Questionnaire to the Trustee's office, the Debtors inadvertently omitted some of the requested bank statements. They believe that they have provided all of the requested statements save for one, Citibank

1 Account *** 1019 for the period November 26 - December 25, 2012. They are attempting
2 to obtain the missing statement and expect to have provided a copy to the Trustee by the
3 time of the hearing.

4 The Debtors believe they have fully and satisfactorily addressed each of the Trustee's
5 concerns as stated in his Motion to Dismiss, with the exception of the single missing bank
6 statement, expected to be provided directly.

7 Respectfully Submitted,

8
9 Dated: **June 5, 2013**

/s/ Dean L. Woerner
DEAN L. WOERNER, Esq.
Attorney for Debtors